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February 3, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Presentation
IB Docket No. 01-185
Mobile Satellite Ventures Subsidiary LLC
File No. SAT-MOD-20031118-00333 (ATC application)
File No. SAT-AMD-20031118-00332 (ATC application)
File No. SES-MOD-20031118-01879 (ATC application)

Dear Ms. Dortch:

On behalf of Mercedes-Benz USA ("MBUSA"), I hereby submit this *ex parte* letter to urge the Commission to afford L-band Mobile Satellite Service ("MSS") operators greater flexibility in their provision of an Ancillary Terrestrial Component ("ATC"), as requested by Mobile Satellite Ventures LP ("MSV") in the above-captioned proceedings. The increased flexibility requested by MSV would make it possible for next-generation MSS systems in the L-band to achieve the coverage, capacity, and economies of scale needed to support ubiquitous telematics services. These developments could assist MBUSA greatly in bringing reliable and extensive service to its telematics customers.

Because our customers operate their vehicles in both urban and rural settings, ubiquitous wireless coverage is critically important for their safety and security. The presence of a robust and healthy mobile satellite communications network capable of seamless satellite and terrestrial service provision could therefore be the foundation for the truly comprehensive telematics safety and security services our customers seek. Moreover, any technology that provides ubiquitous wireless coverage creates significant benefits in emergency response situations.

MSV's proposed ATC service would contribute to ensuring that wireless coverage is available not only in the urban areas where ATC would

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principally operate, but also in the rural areas that lack the population density sufficient to support traditional terrestrial networks, but where telematics users nonetheless travel. In this way, MSV's ATC service could contribute significantly to the safety of our nation's roadways by expanding coverage and, in the process, help to save lives in remote areas of the country.

The Commission is at a crossroads in the development of MSS technology. MBUSA urges the Commission to follow the path of innovation and better consumer service by adopting MSV's proposals for increased flexibility for ATC in the L-band.

Respectfully submitted,

/s/ Ari Q. Fitzgerald

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Counsel to Mercedes-Benz USA